

PHILLIP A. TALBERT
United States Attorney
JAMES R. CONOLLY
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT CHOATE,
SARAH ANDERSON,
FABIAN GOMEZ,
EPIFANIO RAMIREZ,
WENDY LABUDA,
WILLIAM OWEN,
JOALEEN ROGERS,

Defendants.

CASE NO. 2:22-MJ-0095 KJN

STIPULATION FOR EXTENSION OF TIME FOR
PRELIMINARY HEARING PURSUANT TO RULE
5.1(d) AND EXCLUSION OF TIME

DATE: July 1, 2022

TIME: 2:00 p.m.

COURT: Hon. Deborah L. Barnes

Plaintiff United States of America, by and through its attorney of record, Assistant United States Attorney James R. Conolly, and defendants Sarah Anderson, Epifanio Ramirez, Wendy Labuda, and Joaleen Rogers, both individually and by and through their respective undersigned counsel of record, hereby stipulate as follows:

1. The Complaint in this case was filed on June 14, 2022. Defendants Anderson, Ramirez, Gomez, and Rogers first appeared before a judicial officer of the Court in which the charges in this case were pending on June 17, 2022, and Defendant Labuda first appeared on June 21, 2022. The court set a preliminary hearing date of July 1, 2022, and later moved the preliminary hearing for defendant Fabian Gomez only to July 8, 2022. Defendants Robert Choate and William Owen have not yet appeared in

1 this matter and are therefore not included in this stipulation.

2 2. By this stipulation, defendants Anderson, Ramirez, Labuda, and Rogers, and the
3 government, jointly move for an extension of time of the preliminary hearing date to July 8, 2022, at
4 2:00 p.m., before the duty Magistrate Judge, pursuant to Rule 5.1(d) of the Federal Rules of Criminal
5 Procedure. The parties stipulate that the delay is required to allow the defense reasonable time for
6 preparation, and for the government's continuing investigation of the case. The parties further agree that
7 the interests of justice served by granting this continuance outweigh the best interests of the public and
8 the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

9 3. The parties agree that good cause exists for the extension of time, and that the extension
10 of time would not adversely affect the public interest in the prompt disposition of criminal cases.
11 Therefore, the parties request that the time between July 1, 2022, and July 8, 2022, be excluded pursuant
12 to 18 U.S.C. § 3161(h)(7)(B)(iv), Local Code T-4.

13 IT IS SO STIPULATED.

14 Dated: June 30, 2022

PHILLIP A. TALBERT
United States Attorney

15
16 /s/ JAMES R. CONOLLY
JAMES R. CONOLLY
Assistant United States Attorney

17
18 Dated: June 30, 2022

19 /s/ DANIEL OLMOS
DANIEL OLMOS
Counsel for Defendant
SARAH ANDERSON

20 Dated: June 30, 2022

21 /s/ OLAF HEDBERG
OLAF HEDBERG
Counsel for Defendant
EPIFANIO RAMIREZ

22
23 Dated: June 30, 2022

24 /s/ TASHA CHALFANT
TASHA CHALFANT
Counsel for Defendant
WENDY LABUDA

25
26 Dated: June 30, 2022

27 /s/ TAMARA SOLOMON
TAMARA SOLOMON
Counsel for Defendant
JOALEEN ROGERS

PHILLIP A. TALBERT
United States Attorney
JAMES R. CONOLLY
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT CHOATE,
SARAH ANDERSON,
FABIAN GOMEZ,
EPIFANIO RAMIREZ,
WENDY LABUDA,
WILLIAM OWEN,
JOALEEN ROGERS,

Defendants.

CASE NO. 2:22-MJ-0095-KJN

**FINDINGS AND ORDER EXTENDING TIME
FOR PRELIMINARY HEARING PURSUANT
TO RULE 5.1(d) AND EXCLUDING TIME**

DATE: July 1, 2022

TIME: 2:00 p.m.

COURT: Hon. Deborah L. Barnes

The Court has read and considered the Stipulation for Extension of Time for Preliminary Hearing Pursuant to Rule 5.1(d) and Exclusion of Time, filed by the parties in this matter on June 30, 2022. The Court hereby finds that the Stipulation, which this Court incorporates by reference into this Order, demonstrates good cause for an extension of time for the preliminary hearing date pursuant to Rule 5.1(d) of the Federal Rules of Criminal Procedure.

Furthermore, for the reasons set forth in the parties' stipulation, the Court finds that the interests of justice served by granting this continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The Court further finds that the extension of time would not adversely affect the public interest in the prompt disposition of criminal cases.

1 THEREFORE, FOR GOOD CAUSE SHOWN:

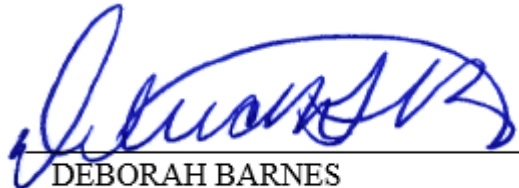
2 1. The date of the preliminary hearing is **EXTENDED** to **July 8, 2022, at 2:00 p.m.**

3 2. The time between July 1, 2022, and July 8, 2022, shall be excluded from calculation
4 pursuant to 18 U.S.C. § 3161(h)(7)(A).

5 3. Defendants shall appear at that date and time before the Magistrate Judge on duty.

6
7 IT IS SO ORDERED.

8
9 Dated: June 30, 2022

10
11 
12 DEBORAH BARNES
13 UNITED STATES MAGISTRATE JUDGE
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28